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Counsel for Debtor

Attorney for Debtor -- I.D. # NF/6129

United States Bankruptcy Court  
District of New Jersey -- Newark  
-----X  
In re:

Jeanel N. Roman

**Chapter 13**

Case # 22-14013-RG

Debtor

-----X

**DEBTOR'S COUNSEL'S CERTIFICATION IN OPPOSITION TO MORTGAGEE'S CERTIFICATION OF DEFAULT**

I, Nicholas Fitzgerald, being of full age and being the above named debtor's counsel, certify under penalty of perjury that:

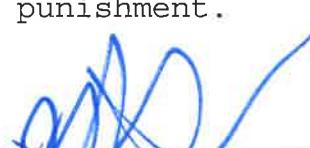
1. I make this certification in opposition to the debtor's mortgagee's certification of default.
2. The reason that I am making this certification as opposed to the debtor is that the debtor is and has been hospitalized and she is now unavailable to meet with or even to freely communicate with her counsel.
3. On December 30, 2024, a payment in the amount of \$2,400

was made to the debtor's mortgagee by the debtor's husband on behalf of the debtor. See attached exhibit.

4. For the reasons stated above, I respectfully request that stay relief not be granted.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 3, 2025

  
Nicholas Fitzgerald  
Debtor's Counsel

**Exhibit -- Copy of Document Showing Payment of \$2,400.00.**

060  
ALLWOOD ROAD (439)  
415 ALLWOOD ROAD  
CLIFTON, NJ, 07012  
Cashbox 01

Business Date DEC 30, 2024  
Calendar Date DEC 30, 2024

Payment 15:13  
Transaction Number 79  
Account Type Mortgage/HEIL/HELOC  
Account Number XXXXXX6244  
Transaction Amount \$ 2,400.00  
Cash Amount \$ 2,400.00  
Principal Payment

This deposit or payment is accepted subject to verification and to the rules and regulations of this bank. Deposits may not be available for immediate withdrawal. Receipt should be held until verified with your statement.